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**May 31, 2023**

**Via ECF**

**MEMO ENDORSED**

Hon. Laura Taylor Swain, USDJ  
United States District Court, SDNY  
40 Foley Square  
New York, NY 10007

**Re: Gumaneh et al v. Vilano Employment Services, Inc. et al**  
**Case No. 22-CV-00774 (LTS)(KHP)**  
**Motion for Extension of Time**

Dear Judge Swain:

My firm represents plaintiffs in the above-referenced action, and I respectfully write to request a very short extension of two days of the May 31, 2023, deadline for the Plaintiffs to file their motion for a default judgment to June 2, 2023. We were fully expecting to file the papers today and since the last request Plaintiffs have reviewed and signed the relevant papers. The additional time is needed to format, finalize and file the motion papers and in light of some mediations that Plaintiffs' counsel must participate in this week as well – hence only a short request of two additional days is being requested. Three prior requests for an extension of this deadline were made and granted. This request does not affect any other deadlines or appearances in this matter.

I thank the Court in advance for its time and consideration.

Respectfully submitted,

Abdul Hassan Law Group, PLLC

/s/ Abdul Hassan  
By: Abdul K. Hassan, Esq. (AH6510)  
*Counsel for Plaintiffs*

**Cc: Defense counsel via ECF**

The request for an extension of time is granted. The Court hereby extends the Plaintiffs' deadline to file a motion for a default judgment from May 31, 2023, to June 2, 2023. The Court finds that there is good cause for the extension for the reasons stated herein. DE no. 51 resolved.

SO ORDERED.

6/1/2023

/s/ Laura Taylor Swain, Chief USDJ